

EXHIBIT 1

KYLE GOINS
KYLE GOINS vs . CSAA FIRE & CASUALTY

January 09, 2018

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA
CASE NO.: 17-CV-347-JHP-MJX

1. KYLE GOINS,)
2. KARI GOINS,)

Plaintiffs,)

vs.)

1. CSAA FIRE & CASUALTY)
INSURANCE COMPANY, a foreign)
for-profit insurance)
corporation,)

Defendant.)

DEPOSITION OF KYLE GOINS
TAKEN ON BEHALF OF THE DEFENDANT
IN TULSA, OKLAHOMA
ON JANUARY 9, 2018

REPORTED BY: JOHN Q. MARTIN, II, CSR #1940

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1 Q. Is that a yes?

2 A. Yes.

3 Q. And you don't recall who you spoke with, is
4 that correct?

5 A. Correct.

6 Q. T-Town just happened to be the one that called
7 you back?

8 A. Yes, sir.

9 Q. Okay. Now, you said a storm event came
10 through your neighborhood. When did that storm event
11 occur?

12 A. July.

13 Q. So, you have a storm event, to the best of
14 your recollection, that occurred in July of 2016, is
15 that correct?

16 A. Yes, sir.

17 Q. And in December you have somebody come look at
18 your roof?

19 A. I apologize. Brian had come out in August and
20 then in December is when Brian and AAA were on the
21 roof to inspect. So, that was an inspection. That's
22 what I thought you meant.

23 Q. Okay. So, to make sure that I've got your
24 testimony accurately, when I'm saying inspection, I'm
25 not just talking about insurance inspection, I'm

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1 Q. And what gave you this belief that it had been
2 damaged by wind?

3 A. Because of the event.

4 Q. Was there anything physically to the roof that
5 caused you to believe that your roof had been
6 damaged?

7 A. Yes.

8 Q. And what exactly was that?

9 A. Missing shingles.

10 Q. You had missing shingles on your roof sometime
11 after July of 2016?

12 A. Yes, sir.

13 Q. Sorry, let me finish. Sometime between July
14 2016 and before you made your claim with CSAA, there
15 were shingles on your roof missing?

16 A. Yes.

17 Q. Did you replace those shingles?

18 A. Yes.

19 Q. And before you made the claim with CSAA did
20 you replace those shingles?

21 A. No.

22 MR. MCGREW: And let's be clear on the record,
23 now you're saying, did you replace them as opposed to
24 did you have them replaced.

25 MR. ROONEY: Don't worry, Mike, I'll make sure



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1 I get that cleared up.

2 Q. (BY MR. ROONEY) So, in --

3 A. Could you repeat that again. Because the only
4 reason the shingles were replaced was after the CSAA
5 inspection in December. They were replaced after
6 that.

7 Q. We'll start back between July -- after this
8 storm event in July you said that you believe there
9 were some shingles missing on your roof, is that
10 correct?

11 A. Correct.

12 Q. And before you made your claim with CSAA did
13 you, whether it be you personally or somebody you
14 hired, repair or replace those missing shingles?

15 A. No.

16 Q. And you spoke with Brian about helping you
17 with this roof. Between July of 2016 and December,
18 when you made your claim with CSAA, had there been
19 any changes that you made to the roof, whether you
20 had somebody go up and look at it, inspecting it,
21 repair it, did anything change since the time Brian
22 looked at it and the time you made your claim with
23 CSAA?

24 A. No.

25 Q. Do you recall where those missing shingles



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1 were located?

2 A. Yes, sir, on the front north side of the home,
3 on the rake of the roof.

4 Q. When you say the rake of the roof what are you
5 talking about?

6 A. There is a pitch on the front of my home above
7 the garage.

8 Q. Are you talking about the very top of the
9 roof, at the peek?

10 A. The peek, it was right down here on this side
11 of it, all the shingles were blown off.

12 Q. Okay. So, if I'm looking at your garage is it
13 the right side or the left side of the --

14 A. Your right side.

15 Q. And is it in the field or is it on the ridge
16 that the shingles were missing?

17 MR. MCGREW: He said the rake. That's the
18 edge, it's the outer edge. You're using the wrong
19 term.

20 MR. ROONEY: Thank you. It's been a long
21 morning for me already. Please forgive me, guys.

22 (Off the record)

23 Q. (BY MR. ROONEY) Mr. Goins, we're back on the
24 record. You understand that your testimony is still
25 under oath?

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1 A. Yes, sir.

2 Q. Since our short break, is there any portion
3 of the testimony you've given today that you feel you
4 need to correct or change?

5 MR. MCGREW: No.

6 THE WITNESS: No, sir.

7 MR. ROONEY: Mike, are you instructing the
8 witness how to answer that question?

9 MR. MCGREW: No. It's more of a lashing at
10 you for that question. But go ahead. Sorry.

11 Q. (BY MR. ROONEY) Now, when we took our break
12 you were telling me that you noticed after this July
13 windstorm that there were some shingles missing on
14 the rake of the roof near your garage, is that
15 correct?

16 A. Correct.

17 Q. When did you first notice those shingles
18 missing?

19 A. Within a day or two of the storm.

20 Q. Do you recall the exact date of the storm?

21 A. I'm going to say July 14th or 15th. I can't
22 say exactly.

23 Q. I'm not trying to trick you, I'm just trying
24 to get what you recall. If you're guessing or
25 estimating a date or time just let me know it's an



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1 missing shingles. Was there any other damage that you
2 were aware of with respect to your roof when you made
3 the claim in December?

4 A. Other than the shingles being scattered
5 throughout my yard and the missing shingles, that was
6 the extent that I was aware of.

7 Q. Okay. Are these the same five shingles that
8 you saw missing?

9 A. No, sir.

10 Q. So, there were additional shingles that you
11 saw in your yard?

12 A. Yes, sir.

13 Q. And you believe those shingles came from your
14 roof?

15 A. Absolutely.

16 Q. And do you know where on your roof these
17 shingles came from, the ones in your yard?

18 A. No, sir.

19 Q. So, it's your testimony that in addition to
20 the five shingles that you noticed missing on the
21 rake there were other shingles in your yard that you
22 believe came from your roof somewhere, correct?

23 A. Correct.

24 Q. But you don't know where on your roof?

25 A. Correct.



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1 Q. Or Brian's employer?

2 A. Yes, Brian.

3 Q. Do you know, did you pay him directly or was
4 it through whoever he was employed by?

5 A. I paid him directly.

6 Q. Okay. So, what caused you to turn in your
7 claim to CSAA, why did you decide to turn in a claim?

8 A. Because of the storm event that happened in
9 July we had noticed that everybody in the neighborhood
10 had damage and was getting their roof repaired.

11 Q. Now, when you say everybody in the
12 neighborhood was getting their roof repaired, do you
13 have the names of any individuals that got their roof
14 repaired after this July storm?

15 A. Yes, I do.

16 Q. Okay. Who are those individuals?

17 A. Candice and Aaron McCaffrey.

18 Q. Okay.

19 A. As far as any other names in the neighborhood
20 I couldn't give you any more.

21 Q. And where does Mr. and Mrs. McCaffrey live in
22 relation to you, are they neighbors, across the
23 street?

24 A. They lived directly to my west, but they have
25 moved since.



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1 Q. They were the house right next door to you to
2 the west?

3 A. Yes.

4 Q. And do you know, those repairs, do you know
5 why they were made?

6 A. To their home?

7 Q. Yes.

8 A. Due to the July storm.

9 Q. Have you discussed the repairs with them?

10 A. No.

11 Q. Okay. So, how do you know the repairs that
12 were being performed to their roof was related to the
13 July storm?

14 A. Because of Ryan, the guy that was performing
15 the repair.

16 Q. Okay. Ryan, and just so I understand, when
17 you're saying Ryan you're talking about the second
18 roofer you spoke with, is that correct?

19 A. Correct.

20 Q. So, Ryan told you that your neighbors had
21 their roof repaired as a result of the July storm?

22 A. Correct. And that he could see damage from
23 their roof and could see the damage on mine.

24 Q. When did you speak with Ryan regarding
25 McCaffrey's roof?



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1 to make a claim?

2 A. I believe so.

3 Q. And when you decided to make a claim, was that
4 at the recommendation of Brian or is this somebody
5 else or is this just a decision you and your wife came
6 to on your own?

7 A. That was a decision my wife and I came to.

8 Q. Now, what damages did you observe as a result
9 of the windstorm that you are claiming to CSAA in
10 December?

11 A. That my gates were blown off, my gutter on the
12 east side was dislodged from the home and I had
13 missing shingles and several shingles scattered
14 throughout my yard.

15 Q. So, in July you noticed -- sorry, back up.
16 When did you notice the gutter was dislodged?

17 A. The day of.

18 Q. Okay. And when you said gates blown off, do
19 you have multiple gates on your property?

20 A. Two.

21 Q. And were both of them blown off?

22 A. Yes.

23 Q. And did you, prior to presenting your claim to
24 CSAA, repair those gates?

25 A. No.



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1 believe she met Shane.

2 Q. Okay. Were your children home?

3 A. I believe they were.

4 Q. Same thing, inside the house?

5 A. Yes.

6 Q. After Mr. Haar got off the roof did he do any
7 further inspection around the property?

8 A. No.

9 Q. So, the roof was the last thing that he
10 inspected?

11 A. Yes.

12 Q. Did you have any conversations with Mr. Haar
13 after he completed his inspection?

14 A. Yes.

15 Q. Okay. What do you recall about -- let me back
16 up real quick. Was Brian present during that
17 conversation?

18 A. Yes.

19 Q. Okay. And do you recall that conversation?

20 A. Yes. Shane informed me that, although my roof
21 was damaged, it wasn't enough as far as AAA was
22 concerned to file -- to pursue this claim.

23 So, he suggested that it would be in my best
24 interest to keep my rates from going up to withdraw
25 the claim and pay for it out of my pocket.

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1 A. It was in my best interest to withdraw.

2 Q. I'm sorry, I'm going to finish my question.
3 Again, I know you think you know where I was going.

4 He could have given you the option, but to
5 your recollection it was his suggestion that you
6 withdraw the claim?

7 A. Yes.

8 Q. Now, did you decide to withdraw your claim?

9 A. Yes.

10 Q. Now, when you made that decision did you make
11 it there at that same inspection?

12 A. I don't believe so.

13 Q. So, you contacted him or he contacted you
14 later and you told him you wanted to withdraw the
15 claim?

16 A. I believe I contacted Andrew Smith.

17 Q. Andrew Smith you think is the one you think
18 you talked to and told him you wanted to withdraw your
19 claim?

20 A. Correct.

21 Q. Now, prior to making that decision did you
22 have any conversations with Brian regarding whether
23 you should pursue your claim or whether you should
24 withdraw it?

25 A. No.

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1 Q. Did Brian give you any input on his opinion
2 regarding whether you should pursue the claim or
3 withdraw it?

4 A. No. He left that up to me. He did agree that
5 the roof was damaged, but it was totally up to me how
6 far I wanted to pursue it.

7 Q. Just so I understand what you're saying, Brian
8 agreed the roof was damaged?

9 A. Uh-huh.

10 Q. But he told you it was your call, whatever you
11 wanted to do?

12 A. Correct.

13 Q. Did Brian tell you the extent of damage he
14 observed when he was inspecting the roof for the first
15 time in December?

16 A. No.

17 Q. I'm sorry. While he was walking the roof for
18 the first time in December?

19 A. No.

20 Q. Did he tell you that he agreed with Mr. Haar's
21 assessment regarding the extent of damage to the roof?

22 A. No, he didn't tell me that he agreed with
23 Shane. He said the roof was damaged. That was the
24 extent of it as far as Brian and I's conversation
25 about it.

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1 Q. So, Brian gave you no opinions regarding what
2 he believed the extent of damage, regarding how you
3 should proceed with your claim, he just said there's
4 damage, do what you want?

5 A. Absolutely. He said, it's your call. The
6 roof is damaged, but he didn't know my circumstances,
7 so he left that option up to me.

8 Q. Did you ask him what he believed the extent of
9 damage to your roof was?

10 A. To his opinion, the roof needed to be replaced
11 is what he told me.

12 Q. Brian told you this?

13 A. Yes.

14 Q. Not Ryan?

15 A. Brian.

16 Q. Did he tell you this before or after you made
17 the decision to withdraw your claim?

18 A. Before.

19 Q. So, if Brian told you that the roof in his
20 opinion was a total loss what made you decide to go
21 ahead and withdraw your claim?

22 A. Well, Mr. Haar mentioned something about my
23 rates could possibly go up.

24 Q. And if Mr. Haar testified that he did not make
25 any comments regarding that would he be lying?

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1 A. Correct.

2 Q. Did he explain to you why he believed the roof
3 was totalled?

4 A. No.

5 Q. Okay. Now, after you withdrew your claim it's
6 my understanding that you contacted CSAA and told
7 them you wanted to resubmit the claim, is that
8 correct, or reopen the claim?

9 A. Correct.

10 Q. What caused you to reopen the claim?

11 A. Ryan Smith was doing a lot of repairs in that
12 neighborhood and asked, because he could see some
13 damage from the ground, he asked if it was okay if he
14 got up there to take a look. And I said sure. And
15 then when he comes down he says, this roof is one of
16 the worst roofs in this neighborhood. And he's done
17 thirteen to fourteen roofs at that time. And he
18 suggested that I reopen this claim because there's
19 serious damage.

20 Q. And when did Ryan ask if he could -- what
21 month did he first approach you?

22 A. Within the early part of 2017.

23 Q. And did he tell you why he was out there
24 making repairs to other homeowners' roofs in the
25 neighborhood?

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1 question.

2 Other than your attorney, has anybody told you
3 that your roof is totalled as a result of storm
4 damage?

5 A. Yes.

6 Q. Who?

7 A. Mickey Manzer.

8 Q. Mickey Manzer told you that your roof is
9 totalled as a result of storm damage?

10 A. Yes.

11 Q. Who is Mickey Manzer?

12 A. He's a AAA inspector.

13 Q. And we'll come back to your conversations with
14 Mickey shortly, sorry, Mr. Manzer.

15 Has anybody other than Brian, Ryan and
16 Mr. Manzer told you your roof was a total loss as a
17 result of storm damage?

18 MR. MCGREW: And again, that excludes any
19 conversations with me or my representatives or my
20 son.

21 THE WITNESS: Okay. To answer that question
22 then, no.

23 Q. (BY MR. ROONEY) Okay. So, after Ryan Smith --
24 just to simplify this, so we don't have confusion,
25 Mr. Smith.

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1 Q. You just took him at his word, right?

2 A. Correct.

3 Q. And did CSAA say you couldn't have a second
4 inspection?

5 A. They said that we would have to provide more
6 photos.

7 Q. So, you told him by law you're entitled to an
8 inspection and they said give us photos, is that
9 correct?

10 A. More or less, yes.

11 Q. Now, do you know what the law requires in
12 order -- this law you're claiming, do you know what it
13 requires for you to be entitled to a second
14 inspection?

15 A. No.

16 MR. MCGREW: Counsel, for the record, we're
17 not claiming that it's a law, regardless of what
18 people may think. You and I know we're not claiming
19 it's a law.

20 MR. ROONEY: Just following up on his
21 testimony. I'm going to ask that you object to the
22 form, nothing else. That was his testimony.

23 Q. (BY MR. ROONEY) So, CSAA said, send us some
24 pictures and we'll do a re-inspection, is that
25 correct?

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1 A. They said to submit some photos and they would
2 determine if it was worth sending another inspector
3 out.

4 Q. And did you submit those photos?

5 A. Yes.

6 Q. Okay. And did you submit the photos in a
7 relatively short period of time after your
8 conversation with CSAA?

9 A. I believe it was, yes.

10 Q. And after you submitted those photos did CSAA
11 agree to perform an inspection?

12 A. Yes.

13 Q. And did somebody contact you to schedule that
14 inspection?

15 A. Yes.

16 Q. Do you recall who that was?

17 A. No.

18 Q. Were you the one that set up the inspection or
19 did Ryan set up the inspection?

20 A. I did.

21 Q. And I'm referring to the second inspection.
22 Sorry. I just want to make sure we're clear. Does
23 that change your answer any?

24 A. No.

25 Q. Okay. You do not recall who contacted you to

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1 Q. Was anybody else present during his
2 inspection?

3 A. Ryan.

4 Q. And Mr. Smith, right?

5 A. Yes.

6 Q. So, it was you, Mr. Smith and Mr. Manzer,
7 correct?

8 A. Correct.

9 Q. Was your wife present?

10 A. No.

11 Q. Were your children present?

12 A. No.

13 Q. Do you recall who arrived first?

14 A. No, because I was the last one to arrive.

15 Q. Okay. So, you came home for the inspection?

16 A. Yes.

17 Q. When you arrived were Mr. Manzer and Mr. Smith
18 speaking?

19 A. No.

20 Q. To your knowledge, had they introduced
21 themselves to each other?

22 A. No. When I arrived Mr. Manzer stepped out and
23 said to Ryan and I that --

24 MR. MCGREW: Stepped out from where?

25 THE WITNESS: I'm sorry. Stepped out from his

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1 truck because they were parked right there. He steps
2 out and we introduce ourselves. And Mickey's words
3 to us was, if you're wanting us to buy this roof on
4 wind then you're wasting our time because we've
5 already -- because AAA doesn't buy roofs on wind, is
6 what he told us. But he would be more than happy to
7 get on the roof if we'd like him to.

8 Q. (BY MR. ROONEY) It's your testimony that
9 Mr. Manzer, as he got out of his car and introduced
10 himself he told you that CSAA doesn't buy roofs on
11 wind and you're just wasting your time?

12 A. Correct.

13 Q. Did he get up on the roof?

14 A. Yes.

15 Q. Did Mr. Smith get on the roof with him?

16 A. Yes.

17 Q. And did Mr. Smith and Mr. Manzer walk the
18 entire roof?

19 A. Yes.

20 Q. By that time you had already patched or
21 repaired the five missing shingles, right?

22 A. Yes.

23 Q. Had you made any other repairs other than the
24 flashing at that time?

25 A. No.



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1 A. No, not that I'm aware of.

2 Q. Did you follow them around, while you were on
3 the ground did you follow what they were doing?

4 A. No, sir.

5 Q. Where were you during the inspection?

6 A. I was in the front yard on the north side of
7 the home.

8 Q. Now, after Mr. Manzer finished inspecting the
9 roof, after he got down what happened?

10 A. Well, he comes down, I asked him what he
11 thought. He said, I agree with you too, the roof is
12 bad, it's totalled, it should be replaced. He said,
13 any other carrier would replace this roof, but not
14 AAA. And that he had this same situation come up a
15 week prior and it was rejected. And that a
16 supervisor, when he did send the information his
17 supervisor asked him, what the hell are you doing.

18 Q. Okay. Now, you just put air quotes around
19 "what the hell are you doing."

20 MR. MCGREW: Well, you need to make sure that
21 he's finished with everything he said. You started
22 asking him another question.

23 Q. (BY MR. ROONEY) I'm sorry, were you finished
24 with your answer?

25 A. Yes. As far as my air quotes, that is what

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1 Mickey Manzer said to me. He said that's what his
2 supervisor had informed him, that you know this is
3 going to be rejected, so you're basically wasting
4 your time.

5 And at that point Ryan pointed down the
6 street. He had already done thirteen to fourteen
7 homes in that neighborhood. And there was a
8 gentleman that had AAA as well that was rejected the
9 first time. And until they had sent a AAA field
10 adjustor out to look at the roof the second time the
11 roof was bought within ten minutes, is what Ryan had
12 told Mickey and I.

13 MR. ROONEY: Move to strike because there was
14 no question on the table at that point in time.

15 MR. MCGREW: You asked him what all was said
16 and now you're striking --

17 MR. ROONEY: I asked him what Mr. Manzer told
18 him.

19 MR. MCGREW: I think you asked what happened
20 when they got off the ladder.

21 THE WITNESS: The conversation when they came
22 down.

23 MR. MCGREW: Let's take a break and I'm going
24 to read the question.

25 (Off the record)

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1 Q. What do you recall happened after the two got
2 off the roof?

3 A. Okay. Once the two come down off the roof I
4 said, what do you guys think? Mickey says, I agree,
5 the roof is totalled, the shingles are all unsealed,
6 but AAA is not going to cover this.

7 That's when he informed me of his experience
8 from a week ago when he had the same circumstance and
9 it was rejected.

10 Q. Not to interrupt you, real quick, though, when
11 you say "he" who are you talking about?

12 A. I'm talking about Mickey Manzer.

13 Q. Thank you.

14 A. He said that that same situation had occurred
15 a week ago and that that was rejected. And that any
16 other carrier would buy this roof, but AAA will not
17 based on the findings.

18 Then Ryan, Mr. Smith, brought up that he had
19 done at least thirteen to fourteen homes in the
20 neighborhood and pointed to one specifically down the
21 street that was covered by AAA and that was rejected
22 the first time until AAA sent out a field adjustor on
23 the second time and the roof was bought within ten
24 minutes, per Ryan.

25 Ryan goes off to his truck. Mickey Manzer

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1 turns to me and says, you didn't hear this from me,
2 but I've heard of people canceling their coverage,
3 hiring a new carrier, claiming the roof and getting
4 the roof fixed. And I was shocked. I was surprised
5 to hear that.

6 Q. Are you done?

7 A. Yes.

8 Q. I don't want to interrupt you.

9 So, Mr. Manzer told you that he saw lots of
10 unsealed shingles, is that correct?

11 A. Correct.

12 Q. Did he tell you what he believed the cause of
13 those shingles becoming unsealed was?

14 A. Due to the storm damage and wind and the event
15 that happened in July.

16 Q. And Mr. Manzer told you that it was his
17 opinion that the shingles became unsealed as a result
18 of the windstorm that occurred in July of 2016?

19 A. Correct.

20 Q. This isn't what Mr. Smith told you, this is
21 what Mr. Manzer told you?

22 A. Correct.

23 Q. Now, Mr. Smith said that a house down the
24 street was insured by AAA and had its roof replaced,
25 is that correct?

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1 A. Correct.

2 Q. What house, do you know the address of that
3 house?

4 A. No, I do not.

5 Q. So, he just arbitrarily pointed down the
6 street generally in that direction and said there's a
7 house down there?

8 A. Yes.

9 Q. You don't know which house he was talking
10 about?

11 A. I know where about it is on the street, but I
12 couldn't give you the address or the gentleman's
13 name.

14 Q. Do you know how many houses down the street?

15 A. Eight to ten possibly.

16 Q. East or west, north or south?

17 A. That would be north.

18 Q. Did he tell you why AAA purportedly replaced
19 that roof?

20 A. Because it was almost as bad as mine.

21 Q. Did he say it was wind damage, other damage,
22 did he say the cause, the reason that they actually
23 replaced the roof?

24 A. He said that it was replaced.

25 Q. You don't know why it was replaced?

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1 A. Due to the storm.

2 Q. He told you due to the storm in July of 2016
3 a roof about eight to ten houses down was replaced by
4 AAA?

5 A. Correct.

6 Q. And do you know the condition of that house,
7 how old it was, what maintenance had been performed,
8 what type of roof, anything regarding that house?

9 A. No, I do not. I assume it's ten to eleven
10 years old like mine.

11 Q. Did he tell you who the adjustor that came out
12 and inspected the house was when the roof was agreed
13 to be replaced?

14 A. No, he didn't. He said it was a AAA field
15 adjustor that came out the second time and bought the
16 roof within minutes. That's when we asked Mickey and
17 he said, you get two shots and that's it as far as the
18 inspection goes.

19 Q. Mickey told you you get two shots, that's it?

20 A. Uh-huh, yes.

21 Q. Those are his exact words?

22 A. Yes.

23 Q. After Mr. Manzer's inspection did you speak to
24 Mr. Smith?

25 A. Yes.



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1 Q. Now, just a second ago you testified that
2 Mr. Ryan Smith and you agreed with Mickey Manzer that
3 the roof was totalled and there was installation
4 issues. Are you changing your testimony?

5 A. I'm changing my testimony to that Ryan and I
6 agreed that the roof was totalled.

7 Q. And it is now your testimony that you did not
8 agree that there was installation issues?

9 A. Correct.

10 Q. Why are you now changing your testimony?

11 A. Because I didn't understand your full question
12 at the time.

13 Q. What did Mr. Ryan Smith tell you regarding
14 Mr. Manzer's opinions related to the installation
15 issues on your roof?

16 A. I'm sorry?

17 Q. What did Ryan Smith tell you regarding his
18 opinions that Mr. Manzer believed there was
19 installation issues on the roof?

20 MR. MCGREW: I don't understand your question.
21 I'm sorry. Can you rephrase that.

22 Q. (BY MR. ROONEY) Ryan Smith, what did Ryan
23 Smith tell you regarding his opinions of Mr. Manzer's
24 assessment that there was installation issues with
25 your roof?

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1 A. I don't recall Mr. Manzer saying anything
2 about the installation. He said that the roof was
3 totalled and that if it was any other carrier they
4 would buy the roof.

5 Q. So, Mr. Manzer never told you that he saw
6 installation issues on your roof?

7 A. Not that I recall. He said that the roof was
8 totalled and that if it was up to him he would buy
9 the roof, that the roof needed to be replaced because
10 of the storm, the wind damage. And Ryan and I agreed
11 to that.

12 Q. To your knowledge, did Ryan Smith send any
13 pictures in to CSAA on your behalf?

14 A. I believe he tried, but I ultimately had ended
15 up having to send them.

16 Q. You've seen the pictures that were submitted
17 to CSAA in order to get the second inspection,
18 correct?

19 A. Yes.

20 Q. Did you discuss those pictures with Ryan
21 Smith?

22 A. No.

23 Q. He just told you, I can't get them to upload,
24 could you get those over to CSAA for you?

25 A. Yes.